

REMARKS

Claims 1, 3-11, and 13-25 are pending in the present application. Claims 2 and 12 are canceled without prejudice or disclaimer. Claims 1, 3-6, and 9 are amended. Claims 1, 3-6, and 9 contain no new matter and are supported by the specification, including figure 4 and page 5, lines 14-29.

The Office Action rejected claims 1-6 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,466,623 to Youn et al. ("Youn").

Applicants traverse the rejection of claims 1 and 3-6, because Youn fails to disclose each and every element of the claimed invention as arranged in the claims. Applicants traverse the rejection of claim 2, because claim 2 is canceled.

Applicants traverse the rejection of claims 1-6, because Youn fails to disclose each and every element of the claimed invention as arranged in the claim.

Youn fails to disclose the claimed "look-ahead estimator". Claim 1 recites, *inter alia*, "a look-ahead estimator to gather information from said input compressed video signal and said decoder to estimate current signal characteristics of a current picture and future signal characteristics of a future incoming picture". The Office Action mistakenly equated "a delta motion vector circuit 1202", "a base motion vector circuit 1204", and "a new motion vector circuit 1206" of figure 12 in Youn with the claimed "look-ahead estimator". (Office Action, page 4, paragraph 3, referring to page 3 of the previous Office Action). Youn discloses a technique called frame skipping that involves base motion vectors and delta motion vectors, but this is completely different. (Youn, abstract, figure 10, col. 9 line 44 to col. 10, line 53). Applicants have carefully reviewed Youn and cannot find any reference to a "look-ahead estimator" or "signal characteristics of a future incoming picture". Therefore, claim 1 is patentable over Youn.

Claims 2-6 depend, directly or indirectly from claim 1 and, thus, inherit the patentable subject matter of claim 1. Therefore, claims 2-6 are patentable over Youn for the same reasons as claim 1.

Furthermore, claim 1 is patentable over Keesman. Keesman computes complexity values from previous pictures, not future pictures. In contrast Keesman uses "motion estimator 29" to supply "a prediction block and a difference block" so that predictions are made, rather than examining future pictures. (Keesman, figures 1 and 2, col. 1, lines 59-61). Applicants have carefully reviewed Keesman and cannot find any reference to a "look-ahead estimator" or "signal characteristics of a future incoming picture". It appears Keesman uses prediction rather than looking ahead.

Claims 3-6 depend, directly or indirectly from claim 1 and, thus, inherit the patentable subject matter of claim 1. Therefore, claims 3-6 are patentable over Youn for the same reasons as claim 1.

The Office Action rejected claims 7 and 8 under 35 U.S.C. § 103(a) as being unpatentable over Youn as applied to claim 1 and 3 and further in view of U.S. Patent No. 5,889,561 Kwok et al. ("Kwok").

Applicants traverse these rejections for the same reasons given above. Claims 7 and 8 depend, directly or indirectly from claim 1 and, thus, inherit the patentable subject matter of claim 1. Applicants have carefully reviewed Kwok and cannot find any "look-ahead estimator".

The Office Action rejected claims 9-25 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,805,224 to Keesman et al. ("Keesman").

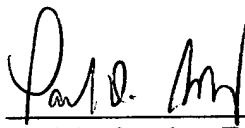
Applicants traverse these rejections for the same reasons given above. Claim 9 recites, *inter alia*, "looking ahead to estimate a future picture complexity for a portion of

a future picture in said at least partially reconstructed video signal; selecting a second coding scheme based on said current picture complexity and said future picture complexity." Claims 10-11, and 13-25 depend, directly or indirectly, from claim 9 and, thus, inherit the patentable subject matter of claim 9. Claim 12 is canceled.

In view of the foregoing, Applicants respectfully submit that all of the claims in the present application are patentably distinguishable over the references cited in the Office Action. Accordingly, Applicants respectfully request reconsideration and that the claims be passed to allowance.

Respectfully submitted,

1-19-04
Date


Paul D. Greeley, Esq.
Reg. No. 31,019
Attorney for the Applicants
Ohlandt, Greeley, Ruggiero & Perle, L.L.P.
One Landmark Square, 10th Floor
Stamford, CT 06901-2682
Tel: 203-327-4500
Fax: 203-327-6401